

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

UNITED STATES OF AMERICA,

v.

STEVEN MONACO

---

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Crim. No. 19-716 (RBK)

---

**JOINT WRITTEN JUROR QUESTIONNAIRE**

---

Juror No. \_\_\_\_\_

## **JURY QUESTIONNAIRE**

*United States v. Steven Monaco* – Crim. No. 19-716 (RBK)

You are being considered for jury service in a criminal case involving charges against defendant Steven Monaco (“the Defendant”). The indictment in this matter (“the Indictment”) charges the defendant with the following crimes: (1) conspiracy to commit health care fraud and wire fraud; (2) health care fraud; (3) wire fraud; and (4) conspiracy to violate the Anti-Kickback Statute and Travel Act.

It is important to remember that the Defendant has denied these charges and pleaded not guilty. The Defendant, like all defendants in this country, is presumed to be innocent of all charges made against him unless and until the Government proves his guilt beyond a reasonable doubt. It is the law of this country that no defendant needs to testify at trial.

The Court has decided to submit certain questions to you in the form of a questionnaire, rather than asking you these questions in open court. The questions are designed only to aid the Court and the lawyers in selecting a fair and impartial jury and not to pry unnecessarily into your personal life. Your answers must be true and complete and will be used only for purposes of selecting a jury in this action.

Do not discuss the questions or answers to these questions with your fellow jurors—it is very important that your answers be your own individual answers. Do not discuss this case with any of your fellow jurors or with anyone else. That means that you should not talk about this case with your friends, family, and co-workers; nor should you communicate about this case through social media, such as Facebook, Instagram, LinkedIn, Twitter, or any other communication source. Do not read anything about the case, watch anything on television about the case, or listen to anything on the radio about the case should it be covered by any media. Do not conduct any research about this case or the participants in this trial, including through the use of the internet. What you learn about the case you will learn in Court only.

Where indicated, check the line for “Yes” or “No.” Provide answers, explanations, or details in the spaces provided. If you need additional space to answer any question, use the last page of the questionnaire, and state the question number. Do not write on the back of any page.

Juror No. \_\_\_\_\_

**I. BACKGROUND**

1. Name: \_\_\_\_\_

2. Age: \_\_\_\_\_

3. Gender: \_\_\_\_\_

4. Place of birth: \_\_\_\_\_

5. County of residence: \_\_\_\_\_

6. Your town or neighborhood: \_\_\_\_\_

7. Which of the following applies to your primary residence?

☐ Own

☐ Rent

☐ Live in parents'/family home

☐ Other

8. What is your current employment status?

☐ Working full-time

☐ Working part-time

☐ Unemployed

☐ Homemaker

☐ Retired

☐ Disabled

☐ Student

9. If employed, what is your primary occupation or employment?

\_\_\_\_\_

10. What is the name of your employer?

\_\_\_\_\_

Juror No. \_\_\_\_\_

11. How long have you worked for that employer or been in that occupation?

\_\_\_\_\_

12. What are your job responsibilities?

\_\_\_\_\_

13. Please list any other jobs you have held in the past 10 years:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

14. Please indicate your level of education (check all that apply)

☐ Did not graduate from high school (highest grade completed: \_\_\_\_\_)

☐ High school diploma or GED

☐ Vocational or trade school

☐ Some college classes

☐ Two-year (Associate) degree

☐ College graduate (Bachelor degree)

☐ Some graduate school

☐ Graduate degree

15. If you attended school beyond high school (college, graduate school, technical education), what school did you attend and what did you study?

\_\_\_\_\_

\_\_\_\_\_

Juror No. \_\_\_\_\_

16. Have you ever served in the military? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES:

a. When? \_\_\_\_\_

b. In what branch did you serve?

\_\_\_\_\_

c. What was your rank?

\_\_\_\_\_

d. Were you honorably discharged? \_\_\_\_\_ YES \_\_\_\_\_ NO

17. Are you married, living with a partner, or in a relationship? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please answer:

a. What is his/her primary occupation or employment?

\_\_\_\_\_

b. What is the name of his/her employer?

\_\_\_\_\_

c. How long has he/she worked for that employer or been in that occupation?

\_\_\_\_\_

d. What are his/her job responsibilities?

\_\_\_\_\_

18. Do you have any children? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please provide their ages, schools, and/or employers:

\_\_\_\_\_

\_\_\_\_\_

Juror No. \_\_\_\_\_

19. Do you have any physical or personal disability, medical condition, hardship, or problem, or is there anything that would make it difficult or impossible for you to serve as a member of this jury, or that would need an accommodation by the Court? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain:

---

---

---

20. Are you now, or have you recently been, under a doctor's care for mental, emotional, or substance abuse problems? \_\_\_\_\_ YES \_\_\_\_\_ NO

21. Are you now taking, or do you anticipate taking, any medication that might in any way affect your attention or your ability to concentrate, understand, consider, and weigh the evidence in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain:

---

---

---

22. Do you have any difficulty with your sight or hearing that could affect your perception of the proceedings? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain: \_\_\_\_\_

---

---

23. Do you have any difficulty understanding or reading the English language?

\_\_\_ YES \_\_\_ NO

If YES, state whether English is your primary language, and state what is the nature of your difficulty:

---

Juror No. \_\_\_\_\_

24. Do you have any religious, philosophical, or other beliefs that would make you unable to render a verdict for reasons unrelated to the law or evidence?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

25. It is expected that this trial will require approximately 2-3 weeks to complete, although one can never be precise as to how long a trial will take. The Court recognizes that jury service for this period of time places a burden on those called to serve as jurors. Nonetheless, the right to a jury trial is an important constitutional right that does require the Court to call upon citizens such as yourselves to make personal sacrifice. Bearing in mind the importance of a trial by jury, do any of you have any reason why you feel that jury service for this period of time would pose a particularly severe burden requiring that you be excused from consideration as a juror?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

26. Please list any civic, social, religious, political, or professional organizations, clubs, or associations to which you belong or volunteer your time:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

27. What are your hobbies or interests outside of work and family?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Juror No. \_\_\_\_\_

28. Please provide the names of any newspapers, magazine, online news services, websites, or other publications that you read regularly:

---

---

---

29. Please provide the names of any radio, television, or internet programs, including podcasts, that you listen to or view regularly:

---

---

---

30. Do you regularly watch, listen to, or read legal dramas/thrillers?

\_\_\_\_\_ YES \_\_\_\_\_ NO

31. The Defendant is presumed innocent. He cannot be convicted unless the jury, unanimously and based solely on the evidence in this case and the law as the Court instructs, decides his guilt has been proven beyond a reasonable doubt. The burden of proving the guilt rests entirely with the Government. The Defendant has no burden of proof at all. Will you accept and apply this rule of law?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If NO, please explain:

---

---

---

32. Can you accept that the Defendant is at this moment presumed to be innocent of any and all crimes charged in the Indictment and that he is presumed to be innocent of these charges throughout the course of the trial?

\_\_\_\_\_ YES \_\_\_\_\_ NO



Juror No. \_\_\_\_\_

If NO, please explain:

---

---

---

33. If you are selected to sit as a juror on this case, would you be willing and able to render a verdict based solely on the facts, exhibits and documents in evidence, and the law as the Court will give it to you in its instructions, disregarding any other ideas, notions or beliefs about the law that you may have encountered?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If NO, please explain:

---

---

---

34. The law does not permit you to consider any emotions such as sympathy, prejudice, vengeance, fear, or hostility in reaching your verdict. Can you put these emotions out of your mind when you listen to the evidence in this case and while you are deliberating toward reaching a verdict?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If NO, please explain:

---

---

---

35. The law does not permit you to consider the issue of sentencing or punishment in reaching your verdict. Do you feel that you would be able to deliberate as a juror on the Defendants' guilt or non-guilt without knowing what punishment they might receive if they were found guilty? \_\_\_\_\_ YES \_\_\_\_\_ NO

Juror No. \_\_\_\_\_

If NO, please explain:

---

---

---

36. Can you render a verdict, whether guilty or not, without considering the question of punishment? \_\_\_\_\_ YES \_\_\_\_\_ NO

If NO, please explain:

---

---

---

37. Do you have any concerns or reservations that a defendant in a criminal case has no obligation or duty to testify or to otherwise explain his side of the case?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain:

---

---

---

38. Do you have any thought that a person charged with a crime is likely guilty?

\_\_ YES \_\_ NO

If YES, please explain: \_\_\_\_\_

---

---

Juror No. \_\_\_\_\_

39. You may hear testimony in this case from one or more cooperating witnesses or from people who were involved in the investigation of the offenses described in the Indictment who will be testifying against the Defendant. The cooperating witnesses have previously been arrested and prosecuted for the commission of offenses similar to those charged in the Indictment. Further, these witnesses may have previously signed an agreement to cooperate with the United States in exchange for some benefit for his or her testimony.

Would you give the testimony of a cooperating witness greater or lesser weight simply because the witness had entered into such an agreement?

\_\_\_ YES \_\_\_ NO

If YES, please explain:

---

---

---

40. Would knowledge of this fact alone prevent you from listening to the cooperating witness and fairly and impartially assessing their credibility in accord with the instruction provided to you by the Court? \_\_\_ YES \_\_\_ NO

41. Do you have any general feeling about the use of cooperating witnesses that would make it difficult for you to render a wholly fair and impartial verdict?

\_\_\_ YES \_\_\_ NO

If YES, please explain:

---

---

42. You may hear testimony that certain witnesses are related to or have been associated with the Defendant, Steven Monaco. In our country there is no such thing as guilt by association. Do any of you have a problem with that principle?

\_\_\_ YES \_\_\_ NO

If YES, please explain: \_\_\_\_\_

---

Juror No. \_\_\_\_\_

**II. PRIOR EXPERIENCE WITH LEGAL SYSTEM**

43. Have you, a family member, or a close friend ever studied or practiced law or worked in a law office? \_\_\_\_ YES \_\_\_\_ NO

If YES, please explain:

---

---

---

44. Have you ever served as a juror or grand juror in the federal, state, or county courts? \_\_\_\_ YES \_\_\_\_ NO

If YES, please state:

a. Where, when, and what type of case?

---

---

---

b. Whether that jury returned an indictment or verdict (do not state the result):

\_\_\_\_ YES \_\_\_\_ NO

c. Would you be able to judge the facts of this case fairly and impartially based on the evidence presented in this Court and in the context of the law as this Court instructs you without reference to anything you might have heard as a result of your past participation as a juror in another case?

\_\_\_\_ YES \_\_\_\_ NO

45. Have you ever had your home, office, or any other premises be the subject of a search by any federal, state, or local agency or law enforcement department?

\_\_\_\_ YES \_\_\_\_ NO

Juror No. \_\_\_\_\_

46. Have you, any member of your family, or close friends ever been subjected to service of a grand jury subpoena by any federal, state, or local agency or law enforcement department?

\_\_\_ YES \_\_\_ NO

47. Have you ever provided information to, been a cooperating informant or witness for, or provided testimony for any federal, state, or local agency or law enforcement department? \_\_\_ YES \_\_\_ NO

48. Have you ever contacted a prosecutor's office, police department, court, or law enforcement agency to report a crime? \_\_\_ YES \_\_\_ NO

49. Have you, any member of your family, or any close friend ever been the subject of an investigation by any agency of the federal government, or any state, county, or local government? \_\_\_ YES \_\_\_ NO

50. Have you, any member of your family, or any close friend been arrested or convicted of a crime or offense (other than a traffic violation)? \_\_\_ YES \_\_\_ NO

If YES, please explain:

---

---

---

If YES:

a. Would that experience affect your ability to be fair and impartial in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

b. Would it otherwise make it difficult for you to sit as a juror in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

51. Have you, a member of your family, or any close friend ever been the victim of a crime? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES:

a. Would that experience affect your ability to be fair and impartial in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

Juror No. \_\_\_\_\_

b. Would it otherwise make it difficult for you to sit as a juror in this case?

\_\_\_\_\_ YES \_\_\_\_\_ NO

52. Have you, any member of your family, or any close friend participated in a criminal case (other than a traffic violation) as a victim, a defendant, or a witness where the case went to court? \_\_\_\_ YES \_\_\_\_ NO

If YES:

a. Would that experience affect your ability to be fair and impartial in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

b. Would it otherwise make it difficult for you to sit as a juror in this case?

\_\_\_\_\_ YES \_\_\_\_\_ NO

53. Do you have any opinions or beliefs concerning the criminal justice system, defendants, prosecutors, law enforcement agents, or criminal defense attorneys that would affect your ability to evaluate the evidence in this case fairly and impartially? \_\_\_\_ YES \_\_\_\_ NO

If YES, please explain:

---

---

---

54. Have you or any relative or close friend ever been a party to any lawsuit?

\_\_\_\_ YES \_\_\_\_ NO

If YES, please explain: \_\_\_\_\_

---

---

55. In this case, you may hear testimony from law enforcement officers from the Federal Bureau of Investigation, the Internal Revenue Service Office of Criminal Investigations, and Department of Labor Office of Inspector General. Have you

Juror No. \_\_\_\_\_

ever had any personal experiences with these agencies, or with any other law enforcement agency?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If YES:

- a. Please explain the nature and extent of your personal experiences with that agency.

---

---

---

- b. Do you think that your experience with that agency will affect the way you view the evidence in this case?

---

---

---

56. In general, do you have any feelings—positive or negative—about law enforcement that could affect the way you view the evidence in this case?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If YES: Please explain:

---

---

---

Juror No. \_\_\_\_\_

**III. CASE-SPECIFIC**

57. Do you know, or have you had any dealings (personal or business) with Steven Monaco or with any relative or close friend of the Defendant?

\_\_\_\_ YES \_\_\_\_ NO

If YES, please explain:

---

---

---

58. Defendant Steven Monaco is represented by attorney Gerard (“Jerry”) Egan of the law firm Egan & McCarthy LLP. The Government is represented by Assistant United States Attorneys R. David Walk, Jr. and Christina O. Hud. The Government will be assisted by their paralegal, Anne DeFay, and Special Agents Scott Stefanowicz and Derek Altieri of the Federal Bureau of Investigation (“FBI”), Special Agent Brandon Galloway of the Internal Revenue Service Criminal Investigations (“IRS-CI”), and Special Agent Kevin Moyer of the Department of Labor Office of Inspector General (“DOL-OIG”).

a. Do you know or have you had any dealings, personal or business, with any of these individuals? \_\_\_\_ YES \_\_\_\_ NO

b. Have you or any relative or close friend ever been employed by or had dealings with any of the parties, entities, or individuals listed above?

\_\_\_\_ YES \_\_\_\_ NO

If YES to either of the above questions, please explain: \_\_\_\_\_

---

---

59. Have you, a family member, or a close friend had any experience with the following governmental entities, agencies, or law firms?

☐ United States Federal Government

☐ United States Department of Justice



Juror No. \_\_\_\_\_

- ☐ United States Attorney's Office
- ☐ Federal Bureau of Investigation ("FBI")
- ☐ Internal Revenue Service, Criminal Investigations ("IRS-CI")
- ☐ U.S. Department of Labor Office of Inspector General ("DOL-OIG")
- ☐ Egan & McCarthy LLP

If YES, please explain:

---

---

---

60. The following individuals or entities may be called as witnesses at trial or their names may come up during the trial. Please identify any name if you know, or if you have had any dealings, personal or business, with that person or entity.

- ☐ Scott Stefanowicz
- ☐ Derek Altieri
- ☐ Brandon Galloway
- ☐ Kevin Moyer
- ☐ Dr. Daniel Oswari of Family Practice Associates
- ☐ Dr. Michael Goldis of Goldis Geriatrics
- ☐ Richard Zappala
- ☐ Dena Rabinowitz
- ☐ Gary Rabinowitz
- ☐ Maria Rabinowitz
- ☐ Todd Jesse

Juror No. \_\_\_\_\_

- ☐ Wei “Julie” Wong
- ☐ Aaron Jones
- ☐ Jason Chacker
- ☐ Scott Chacker
- ☐ Sondre “Sandi” Chacker
- ☐ Lauren Meloscia
- ☐ Alicia Alvarado
- ☐ Linda Lerner
- ☐ Steven Lerner
- ☐ Daniel Sienkiewicz
- ☐ Luz Bagley
- ☐ Dominic Kurtyan
- ☐ Daisylynn Hindermeier
- ☐ Eleanor Thomas (*nee* Hendricks)
- ☐ Leeanne Norris
- ☐ John Norris
- ☐ Amy Norris
- ☐ Capital Health Systems, Inc.
- ☐ KLZ Beauty LLC
- ☐ SJM Consulting LLC
- ☐ Central Rexall Drugs, Inc. (Hammond, LA)
- ☐ Heritage Therapeutics (Holmes, PA)

Juror No. \_\_\_\_\_

☐ Express Scripts (formerly known as MedCo)

☐ Accu Reference Medical Labs

☐ Brian McCarthy, Esq.

☐ Michael Monaco

☐ Matthew Monaco

☐ Kurtis Johnson

☐ Dr. Paul Tayoun (Hazleton, PA)

☐ Kimberly Nyszczo

☐ Vladimir Roudik

If you identified any names, please explain your knowledge of or dealings with that person(s) or entity(ies):

---

---

---

---

61. Are you familiar with any newspaper, television, radio, internet, or other form of news coverage regarding this case? \_\_\_\_ YES \_\_\_\_ NO

62. Have you, any member of your immediate family, or a close friend ever been a sales representative for a pharmaceutical company, laboratory, or pharmacy?

\_\_\_\_ YES \_\_\_\_ NO

If YES, please state your relationship to that person and where that person is/was employed:

---

---

Juror No. \_\_\_\_\_

---

63. Have you, any of your immediate family members, or close friends ever worked in the pharmaceutical industry, or do you/they have any training in pharmacy, medicine, or chemistry? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please identify your relationship to that person and your/their respective training or position:

---

---

---

64. Do you, any member of your immediate family, or close friends have any medical training, or have you or they ever worked in the medical profession?

\_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please identify your relationship to that person and your/their respective training or position:

---

---

---

65. Are you, any member of your immediate family, or a close friend a physician, medical doctor, nurse, or other medical professional? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please state what type of medicine the individual practices, your relationship to him/her, and where that person is employed:

---

---

---

66. Have you, any member of your immediate family, or a close friend ever worked in a business that provided health care services, such as a medical clinic, pharmacy, laboratory, pharmaceutical company, or hospital? \_\_\_\_\_ YES \_\_\_\_\_ NO

Juror No. \_\_\_\_\_

If YES, please describe who and in what capacity:

---

---

67. Have you, any member of your immediate family, or a close friend ever worked in the health insurance industry? \_\_\_\_ YES \_\_\_\_ NO

If YES, please state your relationship to that person and where that person is/was employed:

---

---

---

68. Do you, any member of your immediate family, or any close friend have medical or prescription drug insurance with the New Jersey State Health Benefits Program (“SHBP”) or the New Jersey School Employees’ Health Benefits Program (“SEHBP”)? \_\_\_\_ YES \_\_\_\_ NO

If YES:

- a. The allegations in this case involve SHBP and SEHBP insurance plans. There will be testimony in this case about alleged fraud committed upon the SHBP and SEHBP government insurance plans. Would this affect your ability to be fair and impartial in this case? \_\_\_\_ YES \_\_\_\_ NO

69. Have you, any member of your immediate family, or any close friend had professional or personal experience dealing with compounding pharmacies?

\_\_\_\_ YES \_\_\_\_ NO

70. Have you, any member of your immediate family, or any close friend ever been prescribed compound prescription medications? \_\_\_\_ YES \_\_\_\_ NO

If YES:

- a. Did you/that person have a positive or negative experience with the compound prescription medications?

Please explain further:

Juror No. \_\_\_\_\_

---

---

---

71. Is there anything that the Court should know about that could potentially affect your ability to be a fair or impartial juror in this case? \_\_\_\_\_ YES \_\_\_\_\_ NO

If YES, please explain:

---

---

---

\* \* \*

PLEASE MAKE CERTAIN THAT YOUR JUROR NUMBER IS PRINTED AT THE TOP OF EACH PAGE AND PLEASE SIGN YOUR NAME BELOW:

\_\_\_\_\_  
JUROR SIGNATURE

\_\_\_\_\_  
DATE

Juror No. \_\_\_\_\_

## EXPLANATION SHEET

[illegible]

Juror No. \_\_\_\_\_

[illegible]